

Exhibit A

UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF NEW HAMPSHIRE

LAURIE ORTOLANO

VS NO: 22-CV-00326-LM

THE CITY OF NASHUA, Et Al.

DEPOSITION OF LAURIE ORTOLANO

This deposition taken by agreement of counsel
at the Law Offices of Cullen, Collimore & Shirley,
37 Technology Way, Suite 3W2, Nashua, New
Hampshire, on May 8, 2024, commencing at 10:20 a.m.

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9 ALSO PRESENT: Christine Becotte

10 COURT REPORTER: Rebecca Lynn Metea, LCR

11 STIPULATIONS

12 It is agreed that the deposition shall be
13 taken in the first instance in stenotype and when
14 transcribed may be used for all purposes for which
15 depositions are competent under New Hampshire
16 practice.

17 Notice, filing, caption and all other
18 formalities are waived. All objections except as
19 to form are reserved and may be taken in court at
20 the time of trial.

21 It is further agreed that if the deposition is
22 not signed within thirty (30) days after submission
23 to counsel, the signature of the deponent is
waived.

1 Q Your youngest son was in high school at the
2 time you moved here?

3 A Yes.

4 Q That is as specific as I need.

5 A Okay.

6 Q When you came here, did you join any or seek
7 to join any boards?

8 A No.

9 Q Have you since in Nashua?

10 A Yes.

11 Q Have you been on any boards here?

12 A No, I didn't get appointed.

13 Q Which boards did you seek to get appointments
14 to?

15 A The board of assessor's had openings, when it
16 had an opening, two openings, when I started
17 doing assessing work in 2018, so I applied,
18 but I didn't receive a comment or response
19 back. I applied again in 2019, and I think I
20 received a response that I wasn't a candidate
21 they were looking for.

22 And then I applied to the assessing
23 standards board in -- I think that was 2019

1 -- maybe 2020, and the board itself has two or
2 three public people, and a gentleman who was
3 on it recommended that I take his seat. So he
4 wrote a referral to the governor, and the
5 governor made the recommendation to the
6 executive council, and I wasn't -- they didn't
7 do a vote because the governor knew before the
8 vote that I wasn't supported on a three-two
9 vote, so I didn't get that seat. And I ran
10 for public works in November of 2021, and I
11 lost that seat. That was an actual election.

12 Q The assessing standards board, that was a
13 state board?

14 A Yes.

15 Q You said you started doing assessing work in
16 2018.

17 When you say you started doing
18 assessing work, what do you mean?

19 A The new assessments had come out from KRT, the
20 company hired to do an update in late August,
21 and when I received our new number, I was
22 concerned, and I went to the assessing office
23 and had a conversation, and that started my

1 work into trying to get our property
2 assessment corrected.

3 Q So that is your first foray into what you call
4 assessing work?

5 A I actually did call in 2014 when we moved in,
6 and I saw our assessment jump 5 grand. Our
7 tax bill went up \$5,000. I made my first
8 contact with the tax assessor then.

9 And then I made contact again with
10 the assessing chief in 2017, very concerned
11 when my tax bill cost 18,000, and I thought it
12 was way too high.

13 I had minimal contact at those two
14 points.

15 Q I understand you also assist other people with
16 their assessing challenges, should we say?

17 A Not really. I would say the year after KRT
18 people did seek me out to help them with
19 their -- it wasn't KRT. It was when Vision
20 came out with the new numbers. They asked me
21 to help them out in 2021. I got calls from
22 neighborhoods, and letters saying, we seek
23 your assistance, come to our street, and so I

1 did give assistance, and I published some
2 things on GoodGov, where I told people to look
3 up data. If you are concerned, go look this
4 up.

5 I made a series of videos on GoodGov
6 on how to file an abatement, how to do it
7 yourself, and frankly, the City, I don't
8 think, was very happy about it, and I was
9 pretty squashed in the whole thing, so I never
10 did it again. I had people seek me out last
11 year, and I just didn't do it anymore.

12 Q When you say you think the City wasn't very
13 happy about it, what specifically made you
14 feel the City wasn't very happy about it?

15 A When I tried to assist two senior citizens,
16 and sent the abatements in to be date/time
17 stamped, they sat on them for almost 20 days
18 which is unheard of. That neighborhood had a
19 street of 8 properties to be reevaluated and
20 the City policy, policy practice or guideline
21 was if there is a cluster of houses that are
22 incorrect, they correct those first because
23 they can deal with a pile of them.

1 There was a cluster of houses in
2 that neighborhood at that time in 2021, they
3 ended up dealing with them last. They went to
4 the bottom of the pile.

5 People who went before the board who
6 carried their own assessments in, asked me for
7 help. There were only two I represented.
8 Everyone else went on their own, said to me
9 when they went before the board of assessor's,
10 they were questioned, oh, did somebody help
11 you, don't even say her name, we know who she
12 is. They seemed to be just not happy with the
13 work of what was submitted.

14 Q Sorry. To pin this down a little more, when
15 you say they, who didn't seem happy?
16 Specifically, who are you talking about?

17 A Kim Kleiner, I will say Ms. Kleiner. She was
18 running the assessing office at that time, and
19 I don't believe there was a chief at that
20 time.

21 Q Was it your impression that Ms. Kleiner had
22 direct contact with these applicants?

23 A I think a lot of them screened through the